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14 Attorneys for Defendant:
QUICKEN LOANS INC.

15 [ADDITIONAL COUNSEL LISTED IN SIGNATURE BLOCK]

16
17 UNITED STATES DISTRICT COURT
18 CENTRAL DISTRICT OF CALIFORNIA
19 WESTERN DIVISION

20 AMANDA HILL and GAYLE HYDE,
21 individually and on On Behalf of All
Others Similarly Situated,

22 Plaintiffs,

23 v.

24 QUICKEN LOANS INC.,

25 Defendant.
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Case No. 5:19-cv-00163-FMO-SP

**NOTICE OF MOTION AND
QUICKEN LOANS INC.'S
MOTION TO DISMISS
PLAINTIFFS' SECOND
AMENDED COMPLAINT**

Date: March 12, 2020

Time: 10:00 a.m.

Ctrm.: 6-D

Judge: Hon. Fernando M. Olguin

NOTICE OF MOTION AND MOTION TO DISMISS

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE THAT ON March 12, 2020, at 10:00 am, or as soon thereafter as counsel may be heard, before the Honorable Fernando M. Olguin, in Courtroom 6D of the above-captioned Court, located at 350 W. 1st Street, Los Angeles, CA 90012, Quicken Loans Inc. (“Quicken Loans”)— a sixteen-time J.D. Power award winner for client satisfaction in mortgage origination and servicing— will and hereby does move this Court to dismiss Plaintiffs Amanda Hill (“Hill”) and Gayle Hyde’s (“Hyde”) Second Amended Complaint (“SAC”) in its entirety.

This Motion is made pursuant to Federal Rules of Civil Procedure 8, 12(b)(2), and 12(b)(6) on the grounds that the SAC fails (1) to show that this Court has personal jurisdiction over Hyde’s claim; and (2) to state a cognizable claim for violation of the cellphone provision of the TCPA, 47 U.S.C. § 227(b)(1)(A)(iii). This Motion is based upon this Notice of Motion and Motion, the accompanying Memorandum of Points and Authorities, the Declaration of W. Kyle Tayman (“Tayman Decl.”) filed concurrently herewith, the pleadings and papers on file herein, and upon such other or further material as may be presented at or before the hearing on the Motion.

This Motion is made following the conference of counsel pursuant to Local Rule 7-3, which took place on January 24, 2020.

Respectfully submitted,

Dated: January 31, 2020

By: /s/ Brooks R. Brown

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